

U.S. Department of Justice

United States Attorney Eastern District of New York

BWB:DMP F.#2011R02392 271 Cadman Plaza East Brooklyn, New York 11201

June 27, 2012

By FedEx and ECF

James R. Froccaro, Esq. 20 Vanderventer Avenue, Suite 103W Port Washington, NY 11050

> Re: United States v. Kwan Miller Criminal Docket No. 12-61 (JBW)

Dear Mr. Froccaro:

Enclosed please find supplemental discovery pursuant to Rule 16 of the Federal Rules of Criminal Procedure. The attached discovery is produced subject to the Stipulation and Order so ordered by the Court on April 27, 2012.

I enclose credit card account records for individuals whose credit card information was found in the defendant's possession. These credit card records are from Citibank (KM 2900 to KM 2963), Regions Bank (KM 2964 to KM 3021), Capitol One Bank (KM 3022 to KM 3060) and USAA Federal Savings Bank (KM 3061 to KM 3071). Please note that records relating to American Express were previously produced on March 1, 2012, on a CD-ROM bearing Bates number KM 13.

This letter supplements the government's prior discovery letters and productions of February 15, 2012; March 1, 2012; April 2, 2012; April 11, 2012; April 13, 2012; April 16, 2012; April 18, 2012; April 19, 2012; April 23, 2012; April 24, 2012; April 26, 2012; and June 20, 2012. The government also reiterates its request for reciprocal discovery from the defendant.

If you have any questions, or further requests, please do not hesitate to contact me.

Very truly yours,

LORETTA E. LYNCH United States Attorney

By: /s/ Douglas M. Pravda
Douglas M. Pravda
Assistant United States Attorney
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Enclosures

cc: Clerk of Court (JBW) (w/o enclosures)